

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF)	
UNIVERSITY PROFESSORS, ET AL.,)	
)	
Plaintiffs,)	
v.)	
)	CIVIL ACTION
MARCO RUBIO, in his official capacity)	NO. 1:25-cv-10685-WGY
as Secretary of State, and the)	
DEPARTMENT OF STATE, ET AL.,)	
)	
Defendants.)	
)	

**MOTION OF THE NEW YORK TIMES COMPANY TO INTERVENE FOR THE
LIMITED PURPOSE OF REQUESTING ACCESS TO TRIAL EXHIBITS AND
PROVISIONALLY SEALED PLEADINGS**

The New York Times Company (“The Times”) hereby moves to join in the motion of proposed Intervener Boston Globe Media Partners, LLC (the “Globe”) to intervene in this action for the limited purpose of requesting access to all trial exhibits and provisionally sealed pleadings relied on by this Court in its Findings of Fact and Rulings of Law (“Decision”), ECF No. 261. The Times’ motion includes, but is not limited to, a request for access to all numbered joint exhibits submitted by the parties and made part of the record pursuant to the Court’s protocol, including without limitation Trial Exhibit 16. *See, e.g.*, ECF No. 234 at 15 (Trial Transcript at 15); *see also id.* at 4-5; ECF Nos. 164, 168.

As grounds for its motion, The Times respectfully incorporates by reference the legal arguments made in the Globe’s motion papers. *See generally Federal Trade Commission v. Standard Fin. Mgmt. Co.*, 830 F.2d 404, 407 (1st Cir. 1987) (noting intervention and affirming grant of access to court records); *Anderson v. Cryovac, Inc.*, 805 F.2d 1, 4 (1st Cir. 1986) (intervention to seek access to discovery materials).

WHEREFORE, The Times respectfully requests that the Court grants its motion to intervene and for access to all trial exhibits and provisionally sealed pleadings relied on by this Court in its Decision.

THE NEW YORK TIMES COMPANY,

By its attorneys,

/s/ Samuel D. Thomas

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CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 24, 2025.

/s/ Samuel D. Thomas

Samuel D. Thomas